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VIA ELECTRONIC COURT FILING

Hon. Robert D. Drain
U.S. Bankruptcy Court for the Southern District
of New York
300 Quarropas Street
White Plains, NY 10601

Re: *In re Sears Holdings Corp., et al.*, Case No. 18-23538 (RDD) (Bankr. S.D.N.Y.)

Dear Judge Drain:

We write as special conflicts counsel to the Official Committee of Unsecured Creditors (the “Creditors’ Committee”) in the above-captioned proceeding.

On September 14, 2020, the Creditors Committee filed a *Motion of the Official Committee of Unsecured Creditors for an Order to Compel Bankruptcy Rule 2004 Production of Documents* [ECF No. 8438] (the “Motion to Compel”) and supporting documents in the above-captioned proceeding. Since filing the Motion to Compel, Clearstream Banking AG (“Clearstream”) produced responsive information, and Legal and General Investment Management (“LGIM”) represented that it has no responsive documents or information. In light of their compliance, the Creditors’ Committee hereby withdraws the Motion to Compel as against Clearstream and LGIM. For the avoidance of doubt, the Creditors’ Committee still seeks the relief described in the Motion to Compel as against BMO Nesbitt Burns, Inc., HSBC Global Asset Management (UK) Limited, Jeffries LLC, and PNC Bank, N.A.

Respectfully submitted,

A handwritten signature in blue ink that reads 'James P. Chou'. The signature is written in a cursive, flowing style.

James P. Chou

cc: All counsel by ECF